

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

PENG WANG, QINLIN LI, and YISI  
WANG,

*Plaintiffs,*

v.

KEN PAXTON, Attorney General of Texas,  
in his Official Capacity, only.

*Defendant.*

Case No.

**DECLARATION OF KELIANG “CLAY” ZHU**

I, Keliang “Clay” Zhu, being of competent mind and over the age of 18, declare as follows:

1. I am a member in good standing of the State Bar of California and Oregon, and I am the President of the Chinese American Legal Defense Alliance. I am the counsel for the named Plaintiffs and putative class members in this case. I submit this declaration in support of Plaintiffs’ motion for class certification.

2. I am a 2000 graduate of Willamette University College of Law in Salem, Oregon with a J.D. degree. After law school, I worked as an associate attorney for Beckfield & Wiseman LLP in Salem, Oregon from 2000 to 2004, working on general civil and commercial litigation matters.

3. I then worked for a major international non-profit organization, Landesa ([www.landesa.org](http://www.landesa.org)), as its attorney and China program director with a focus on legal and policy advocacy to protect rural land rights for poor farmers in developing countries from 2004 to 2013. I contributed to several major policy and legislative reforms that enhanced and

secured the property rights for farmers in China, including its first Property Law (enacted in 2007).

4. In late 2013, I left Landesa and opened my own law firm, Meridar Law Firm PC (later known as DeHeng Law Firm PC), in the San Francisco Bay Area. I have been its lead attorney and managing partner till today. I specialize in complex civil and commercial litigation, and advised dozens of major and public-listed companies on cross-border disputes.

5. As the managing partner of DeHeng Law Offices PC, I was deeply involved and provided critical advice in a number of class actions in the areas of corporate governance, contractual disputes, and product liabilities, and I have accumulated adequate experiences in class actions. The notable cases include the following:

- *Peng et al v. Mastroianni et al*, Case No. 9:20-cv-80102 (S.D. Fla., 2020): a case resulting in a successful class certification and the final approval of a class action settlement.
- *Becker v. Volvo*, Case No. 3:25-cv-05331 (N.D. Cal., 2025): a class action involving product liability claims against a major car manufacturer.
- *Kong v. Mastroianni et al*, Case No. 9:25-cv-80121 (S.D. Fla., 2025), a class action on behalf of foreign investors with claims concerning fiduciary duties and limited partnership agreements.

6. In August 2020, I organized and worked pro bono as the co-lead counsel for a high-profile case that successfully challenged and enjoined President Trump's Executive Order regarding the ban of a popular social media app (WeChat). *USWUA et al v. Trump et al*, (N.D. Cal. 2020), Case No. 3:20-cv-05910. The Ninth Circuit denied the government's request to stay the preliminary injunction, and President Biden subsequently withdrew the

Executive order in 2021. The case created an important precedent on how the government can regulate social media applications while balancing the competing interests between national security and the First Amendment.

7. In April 2021, I co-founded a grassroots non-profit organization, Chinese American Legal Defense Alliance (“CALDA”). Its mission is to fight racial discrimination against Chinese Americans through impact litigation. I have worked as a volunteer lawyer and its President since the beginning. CALDA has represented victims of racial discrimination in legal challenges against various laws, regulations, and practices. Working pro bono, I have been the co-lead counsel in a number of legal challenges. The notable ones include:

- *Shen et al v. Simpson et al*, Case No. 4:23-cv-00208 (N.D. Fla. 2023): Co-lead counsel in a constitutional challenge against Florida’s alien land law resulting in a partial preliminary injunction issued by the 11<sup>th</sup> Circuit for the named plaintiffs.
- *Yin et al v. Diaz et al*, Case No. 1:24-cv-21129 (S.D. Fla. 2024): Co-lead counsel in a constitutional challenge against Florida’s SB 846 law resulting a statewide preliminary injunction issued by the federal district court judge.
- *Chen et al. v. Noem, et al.*, Case No. 25-cv-03292 (N.D. Cal. 2025): Co-lead counsel in a constitutional challenge resulting in a nationwide preliminary injunction regarding student visa status.

8. I have no interests that are adverse to or in conflict with the interests of Peng Wang, Qinlin Li, Yisi Wang, or the putative class members.

9. In the past two weeks, I have had extensive conversations including Zoom meetings with the named plaintiffs to explain (a) the nature of a class action and the potential advantages and disadvantages by proceeding in a class action rather than individually; (b) the obligations as class representatives including responding to reasonable discovery requests; (c) the allegations and legal claims in the action; and (d) the key terms of the class action retainer agreement executed between them and their counsel.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed at Pleasanton, California, on July 2, 2025.

/s/ Keliang "Clay" Zhu  
Keliang "Clay" Zhu